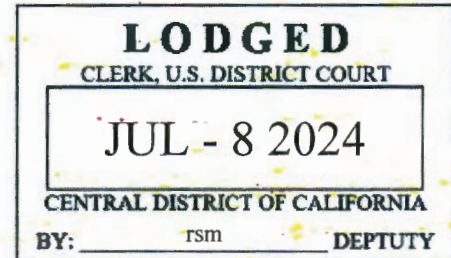


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10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 IN THE MATTER OF THE
EXTRADITION OF

13 PRUDENCIO SEGURA CASTILLO,

14 A Fugitive from the
15 Government of the United
16 Mexican States.

No. **2:24-mj-04053-DUTY**

COMPLAINT

FOR ARREST WARRANT AND EXTRADITION
(18 U.S.C. § 3184); ORDER THEREON

(UNDER SEAL)

17
18 TO: Honorable Margo A. Rocconi
United States Magistrate Judge
19 Central District of California

20 I, John J. Lulejian, being duly sworn, depose and state that I
21 am an Assistant United States Attorney for the Central District of
22 California and act for the United States in fulfilling its
23 obligations to the Government of the United Mexican States ("Mexico")
24 pursuant to the Extradition Treaty Between the United States of
25 America and the United Mexican States, U.S.-Mex., May 4, 1978, 31
26 U.S.T. 5059, as amended by the Protocol to the Extradition Treaty
27 Between the United States of America and the United Mexican States of
28 May 4, 1978, U.S.-Mex., Nov. 13, 1997, S. Treaty Doc. No. 105-46

1 (1998) (collectively, the "Treaty"), with respect to the fugitive,
2 PRUDENCIO SEGURA CASTILLO ("SEGURA CASTILLO"; DOB: **/**/1967).

3 In accordance with Title 18, United States Code, Section 3184, I
4 charge on information and belief as follows:

5 1. Pursuant to the Treaty, Mexico has submitted a formal
6 request to the United States, through diplomatic channels, for the
7 extradition of SEGURA CASTILLO.

8 2. That according to the information provided by Mexico,
9 SEGURA CASTILLO is wanted by Mexico so that he may be prosecuted for
10 sexual abuse, in violation of Article 180 of the Criminal Code for
11 the Free and Sovereign State of Guerrero, Mexico, Number 499. This
12 offense was committed within the jurisdiction of Mexico.

13 3. That on or about May 12, 2020, a Constitutional Rights
14 Judge in Iguala de la Independencia, Guerrero, Mexico, a judicial
15 officer authorized by Mexican law to issue warrants of arrest, issued
16 a warrant in Mexico for SEGURA CASTILLO's arrest for this offense.
17 The warrant remains valid and enforceable.

18 4. That Mexico presents the following facts as the basis for
19 the complaint and arrest warrant:

20 a. On or about April 4, 2020, A.S.E. filed a complaint
21 with Mexican authorities in which she reported that on or about
22 February 24, 2020, SEGURA CASTILLO, who was married to her sister,
23 J.S., sexually abused A.S.E.'s twelve-year-old daughter (the
24 "Victim").

25 b. After receiving the complaint, Mexican authorities
26 interviewed the Victim, who among other things, related the
27 following:
28

1 i. The Victim lived with her mother (A.S.E.), nearby
2 to her aunt (J.S.) and her aunt's children. SEGURA CASTILLO would
3 travel to the United States for work. He arrived in México around
4 the end of January 2020. Because SEGURA CASTILLO was good to the
5 Victim's cousins, the Victim trusted him.

6 ii. On or about February 24, 2020, the Victim,
7 accompanied by her mother, aunt, cousins, and SEGURA CASTILLO,
8 traveled to a lake/lagoon in Tuxpan, in Iguala de la Independencia,
9 Guerrero. The family set up tables and chairs on a pier by the shore
10 of the lake/lagoon.

11 iii. At approximately 4:00 p.m., the Victim and her
12 cousins went into the lake/lagoon and began to play. Approximately
13 one hour later, the Victim's mother told the children that she was
14 going to prepare hamburgers, but they kept playing in the water.

15 iv. At that point, SEGURA CASTILLO entered the water
16 to play with the victim and her cousins. Because they were splashing
17 water at each other, the Victim moved away from the others a little
18 bit, heading toward a deeper area of the lake/lagoon where the water
19 reached above her waist. SEGURA CASTILLO then approached the Victim
20 and grabbed her leg under the water. When the Victim moved
21 backwards, SEGURA CASTILLO stood in front of her, slid his hand
22 inside her shorts, and fondled and squeezed her vagina. The Victim
23 froze and was unable to move because she was scared. SEGURA CASTILLO
24 threatened the Victim, saying that he would do much more than that to
25 her if she told anyone about the incident. SEGURA CASTILLO then went
26 quickly away.

1 v. The Victim then went back to the shore with her
2 cousins. When her mother called her to come eat, the Victim did not
3 feel like eating, but wanted to cry. However, the Victim felt that,
4 if she told her mother about the incident, her mother would become
5 mad and react impulsively. The family members subsequently returned
6 to their homes.

7 vi. The Victim did not say anything about the
8 incident for approximately one month. Then, on or about March 20,
9 2020, the Victim's sister posted on social media that she (the
10 Victim's sister) was raped as a child. After seeing that post, the
11 Victim decided to talk to her parents. Accordingly, in the presence
12 of her mother and father (M.R.C.), who lived apart from the Victim
13 and her mother, the Victim related that on or about February 24,
14 2020, SEGURA CASTILLO touched her vagina when she was in the
15 lake/lagoon in Tuxpan, Iguala de la Independencia, Guerrero. The
16 Victim further told her parents that because SEGURA CASTILLO had left
17 Mexico and had been in the United States since the beginning of March
18 2020, she was no longer afraid that SEGURA CASTILLO would carry out
19 his threats.

20 vii. At her mother's insistence, the Victim went to
21 her grandmother's house and told her grandmother and aunt (J.S.) what
22 occurred at the lake/lagoon on or about February 24, 2020. Even
23 though she saw the Victim crying, her aunt responded by getting angry
24 and accusing the Victim of making up the allegations against SEGURA
25 CASTILLO.

1 c. On or about April 4, 2020, the Victim's mother filed a
2 complaint with Mexican authorities, in which she stated among other
3 things, the following:

4 i. On or about March 20, 2020, her daughter (the
5 Victim) informed her and the Victim's father that SEGURA CASTILLO
6 sexually abused her at the lake/lagoon in Tuxpan on or about February
7 24, 2020.

8 ii. On February 24, 2020, at approximately 5:00 p.m.,
9 she and her sister (J.S.) were preparing hamburgers near the lake,
10 and she (the Victim's mother) observed that the Victim was in the
11 lake/lagoon and that SEGURA CASTILLO entered the water.

12 iii. When the Victim came back to the shore soon
13 after, and was invited to eat, the Victim said she was not hungry.

14 iv. After they left the lake/lagoon, the Victim's
15 mother noticed that her daughter was acting strangely, and she
16 suspected something but did not want to say anything to her daughter
17 about it.

18 v. Following the daughter's revelations about what
19 happened at the lake/lagoon, she and the Victim went to the Victim's
20 grandmother's home, where the Victim again recounted what occurred on
21 February 24, 2020. However, the Victim's aunt (J.S.) did not believe
22 her niece. The Victim's mother believed this is because the Victim's
23 aunt was financially dependent on SEGURA CASTILLO, and thus trusted
24 her husband.

25 d. On or about April 22, 2020, Mexican authorities
26 interviewed the Victim's father (M.R.C.), who related, among other
27 things, that on or about March 20, 2020, at approximately 9:30 a.m.,
28

1 he received a call from the Victim, who was crying. When he went to
2 the home of the Victim and her mother, the Victim then disclosed that
3 SEGURA CASTILLO sexually abused her at the lake/lagoon in Tuxpan on
4 or about February 24, 2020.

5 e. Following the filing of the complaint against SEGURA
6 CASTILLO, Mexican authorities performed a psychological assessment of
7 the Victim. The psychological expert concluded that the Victim
8 exhibited signs of emotional damage.

9 f. On or about July 13, 2022, Mexican authorities
10 conducted separate identification procedures with the Victim's
11 parents. In those proceedings, Mexican authorities showed the
12 parents a photograph of SEGURA CASTILLO, and both the Victim's mother
13 and father separately identified the person depicted in that
14 photograph as the person who sexually abused the Victim.

15 5. U.S. law enforcement believes that SEGURA CASTILLO may be
16 found within the jurisdiction:

17 a. California Department of Motor Vehicles records reveal
18 "Prudencio Segura" obtained a driver's license (No. ****3236) on or
19 about April 5, 2023. The address associated with this driver's
20 license appears to be a residence in Westminster, California. The
21 photograph accompanying this driver's license appears to be the same
22 one that the Victim's mother and father identified as SEGURA
23 CASTILLO. Further, the date of birth matches the date of birth
24 stated in the extradition request.

25 b. Insurance records reveal that "Prudencio Segura" is
26 the registered owner of a 2001 Toyota four-door sedan, bearing
27 California license plate number ***U301. The address associated with
28

1 the registered owner is the same address in Westminster associated
2 with the above driver's license.

3 c. On or about July 2, 2024, the United States Marshals
4 Service ("USMS") traveled to the above address in Westminster and
5 observed a red Toyota Corolla bearing California license plate number
6 ***U301, parked curbside in front of the residence. At approximately
7 7:50 a.m., the USMS observed a Hispanic male adult step outside the
8 subject residence and begin smoking a cigarette. After approximately
9 ten minutes, the man reentered the residence. According to the USMS,
10 the man bore a striking similarity to "Prudencio Segura's" driver's
11 license photograph, which the Victim's mother and father identified
12 as SEGURA CASTILLO, and another photograph of SEGURA CASTILLO
13 included by Mexico in the extradition request.

14 6. Tom Heinemann, an attorney in the Office of the Legal
15 Adviser of the U.S. Department of State, has provided the U.S.
16 Department of Justice with a declaration authenticating a copy of the
17 diplomatic note by which the request for extradition was made and a
18 copy of the Treaty, stating that the offense for which extradition is
19 demanded is provided for by the Treaty, and confirming that the
20 documents supporting the request for extradition are properly
21 certified by the principal U.S. diplomatic or consular officer in
22 Mexico, in accordance with 18 U.S.C. § 3190, so as to enable them to
23 be received into evidence.

24 7. The declaration from the U.S. Department of State with its
25 attachments, including a copy of the diplomatic note from Mexico, a
26 copy of the Treaty, and copies of the certified documents Mexico
27 submitted in support of the request are attached to the Request for
28

1 Certification of Extradition, filed separately and contemporaneously
2 with this complaint and incorporated by reference herein.

3 8. That SEGURA CASTILLO is likely to flee if he learns of the
4 existence of a warrant for his arrest.

5 WHEREFORE, the undersigned complainant requests that a warrant
6 for the arrest of SEGURA CASTILLO be issued in accordance with 18
7 U.S.C. § 3184 and the extradition treaty between the United States
8 and Mexico, so that SEGURA CASTILLO may be arrested and brought
9 before this Court to the end that the evidence of criminality may be
10 heard and considered, and that this complaint and the warrant be
11 placed under the seal of the Court, except as disclosure is needed
12 for its execution, until such time as the warrant is executed.

13
14 DATED: This 8 day of July, 2024, at Los Angeles, California.

15 Respectfully submitted,

16 E. MARTIN ESTRADA
17 United States Attorney

18
19 /s/ John J. Lulejian
20 JOHN J. LULEJIAN
Assistant United States Attorney

21 Attorneys for Complainant
22 UNITED STATES OF AMERICA

23 Subscribed and sworn to by
24 the applicant on this 8 day
of July, 2024.

25
26 
27 HONORABLE MARGO A. ROCCONI
UNITED STATES MAGISTRATE JUDGE